

13400
CDJ

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

"JANE DOE", a pseudonym

Plaintiff,

vs.

RHODE ISLAND SCHOOL OF DESIGN

Defendant.

: CIVIL ACTION NO.

: COMPLAINT

17

1659

: JURY TRIAL DEMANDED

Plaintiff "Jane Doe", a pseudonym, files this Complaint against Defendant Rhode Island School of Design ("RISD"), arising from RISD's negligent conduct, and alleges as follows:

I. INTRODUCTION

1. On June 18, 2016, as a result of RISD's failure to protect Jane Doe from known and obvious dangers, including failing to provide her with a door secured by a locking mechanism, a fellow RISD student raped Jane Doe during a RISD study abroad program in Ireland.

II. THE PARTIES

2. Plaintiff, Jane Doe, is an adult citizen and resident of the Commonwealth of Pennsylvania, who can be contacted through her counsel, Nadeem A. Bezar, Esquire and David C. Williams, Esquire, 1525 Locust Street, the Nineteenth Floor, Philadelphia, Pennsylvania 19102.

3. Plaintiff's name and address are not contained in this Complaint so as to protect the privacy and identity of Jane Doe, who incurred injuries and damages due to Defendant's negligence.

4. Jane Doe's use of this pseudonym is done in good faith in order to avoid humiliation, embarrassment, and additional psychological harm. Plaintiff's identity has been made known to the Defendant by separate communication.

5. Defendant, Rhode Island School of Design (also referred to as "RISD"), is a nonprofit corporation organized and existing under Rhode Island law that provides undergraduate, graduate, professional, and continuing education, which has a registered office address at 2 College Street, Providence, Rhode Island 02902.

6. In or about November 2010, RISD entered into a partnership with "Stitches" Magazine publisher, the Advertising Specialty Institute ("ASI"), to develop "internship and career advancement programs for RISD students in partnership with ASI suppliers and decorators in the [sic] Philadelphia, New York and Providence, Rhode Island." See "Stitches Magazine Partners with Rhode Island School of Design's Textile Department," *available at* <https://www.asicentral.com/news/press/press-releases/november-2010/stitches-magazine-partners-with-rhode-island-school-of-design39s-textile-department/?alttemplate=PressItemPrint> (last accessed Feb. 25, 2017).¹

III. JURISDICTION AND VENUE

7. Federal jurisdiction in this action is predicated upon diversity of citizenship under statutory authority of 28 U.S.C. § 1332. The amount in controversy exceeds \$75,000.00.

8. Venue is proper in the Eastern District of Pennsylvania pursuant to 28 U.S.C. § 1391(b) and (c) because Defendant is subject to the Court's personal jurisdiction with respect to

¹ "In January 2016 Stitches merged with Wearables [magazine] to become one magazine dedicated to the vision of the decorated apparel industry." See "Stitches," *available at* <https://www.asicentral.com/news/magazines/stitches> (last accessed Feb. 25, 2017). ASI is a Pennsylvania corporation with its business address at Bucks County Technology Park, 4800 Street Road, Trevoze, Pennsylvania 19053. See "ASI - Promotional Products Membership Organization," *available at* <http://www.asicentral.com> (last accessed Feb. 25, 2017).

the civil action in question.

9. For purposes of diversity under 28 U.S.C. § 1332, Defendant is a citizen of the State of Rhode Island and Plaintiff is a citizen of the Commonwealth of Pennsylvania.

IV. DEFENDANT'S WRONGFUL CONDUCT

10. At all relevant times, Jane Doe was an enrolled student at RISD.

11. At all relevant times, RISD has operated a summer program for its students, "RISD Global," that provides "3-4 week Global Summer Studies courses" in countries including Iceland, Ireland, Italy, Japan, South Africa, and South Korea. *See* RISD, "Global Summer Studies," *available at* <http://gpp.risd.edu/summer/> (last accessed Feb. 25, 2017).

12. Between Saturday, June 18, 2016 and Saturday, July 16, 2016, RISD offered a global summer study program in Ireland, entitled "Ireland: Illustrating Myths and Legends in the Burren" (hereinafter "2016 Ireland Program").

13. RISD, by and through its employees, agents, or servants, designed the 2016 Ireland Program.

14. RISD, by and through its employees, agents, or servants, selected the individuals who participated in the 2016 Ireland Program.

15. RISD, by and through its employees, agents, or servants, selected the chaperones who participated in the 2016 Ireland Program.

16. RISD, by and through its employees, agents, or servants, selected the housing used by the individuals participating in the Ireland Program.

17. RISD, by and through its employees, agents, or servants, made the rooming arrangements for the individuals participating in the Ireland Program.

18. On June 18, 2016, Jane Doe and her fellow RISD students arrived in Shannon, Ireland as participants in the 2016 Ireland Program.

19. That evening, Jane Doe and certain of her fellow 2016 Ireland Program participants celebrated the birthday of a fellow participant (the "Perpetrator").

20. Jane Doe, the certain participants, and the Perpetrator drank alcohol.

21. Jane Doe became intoxicated.

22. The Perpetrator escorted Jane Doe to the housing provided by RISD.

23. The Perpetrator left Jane Doe's room at some point.

24. Jane Doe closed the door to her room but was unable to lock or otherwise secure the door because it lacked a lock or latching mechanism.

25. Jane Doe went to bed, alone in her room.

26. Later that evening or early morning, the Perpetrator returned to Jane Doe's room, entered through her unsecure door, and forcibly penetrated her.

27. At no time did Jane Doe consent to sexual intercourse with the Perpetrator.

28. The negligence of Rhode Island School of Design directly and proximately caused Jane Doe to suffer the following injuries:

- a. pain and suffering;
- b. embarrassment and humiliation;
- c. loss of life's pleasures;
- d. mental anguish and distress; and
- e. trauma.

COUNT I - NEGLIGENCE
Plaintiff v. Rhode Island School of Design

29. Plaintiff incorporates by reference and re-alleges all paragraphs of this Complaint set forth above as if fully set forth herein.

30. The negligence of Rhode Island School of Design, for the conduct of its actual or apparent agents, servants, and/or employees, consists of one or more of the following:

- a. failure to supervise participants in the 2016 Ireland Program;
- b. failure to develop policies and procedures for rooming arrangements requiring at least two participants of the same gender to room together;
- c. failure to develop policies and procedures for the selection of adequate, safe, and secure housing for participants in the 2016 Ireland Program;
- d. failure to select adequate, secure, and safe housing for participants in the 2016 Ireland Program, including Jane Doe;
- e. failure to provide adequate, secure, and safe housing for participants in the 2016 Ireland Program, including Jane Doe.

COUNT II – PREMISES LIABILITY
Plaintiff v. Rhode Island School of Design

31. Plaintiff incorporates by reference and re-alleges all paragraphs of this Complaint set forth above as if fully set forth herein.

32. Plaintiff was an invitee on Rhode Island School of Design's premises at all times during the aforementioned rape.

33. Plaintiff was an invitee on premises selected and provided by Rhode Island School of Design at all times during the aforementioned rape.

34. In addition to the derivative and vicarious liability of Rhode Island School of Design for the negligent acts and omissions of its employees, servants, and agents, Rhode Island School of Design further owed a direct and non-delegable duty to Jane Doe as an invitee on its premises.

35. Defendant Rhode Island School of Design failed to take reasonable measures to protect Jane Doe against real, open, and obvious dangers it knew or should have known existed at the housing selected for the 2016 Ireland Program.

36. The negligence of Defendant Rhode Island School of Design, acting by and through its authorized agents, representatives, and employees, consists of the following:

- a. failure to employ competent security personnel;
- b. negligent hiring and/or retention of security personnel;
- c. negligent selection and/or supervision of those who provided security services;
- d. failure to provide Jane Doe with a room with a locking or latching mechanism;
- e. failure to warn 2016 Ireland Program participants, including Jane Doe, that the housing doors were unable to be secured;
- f. failure to institute and/or enforce policies and procedures relating to access and security of the housing utilized for the 2016 Ireland Program.

CLAIM FOR RELIEF

As a direct and proximate result of Defendant's negligence as set forth herein, Jane Doe was caused to suffer the injuries as described above.

WHEREFORE, Plaintiff demands judgment against defendant Rhode Island School of Design upon the claims and causes of action stated above, in excess of \$75,000, exclusive of interest and costs, for the amount of Plaintiff's damages to be determined at trial, and for all other and further relief as the Court may deem just and equitable.

Dated this 11th day of April, 2017

Respectfully submitted,

KLINE & SPECTER, P.C.

BY:



NADEEM A. BEZAR, ESQUIRE

Nadeem.Bezar@klinespecter.com

Identification No: PA 63577

DAVID C. WILLIAMS, ESQUIRE

David.Williams@klinespecter.com

Identification No: PA 308745

1525 Locust Street, Nineteenth Floor

Philadelphia, Pennsylvania 19102

(215) 772-1000 (tel.)

(215) 772-2472 (fax)

Attorneys for Plaintiff Jane Doe

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

| | |
|--|--|
| I. (a) PLAINTIFFS "Jane Doe", a pseudonym | DEFENDANTS Rhode Island School of Design |
| (b) County of Residence of First Listed Plaintiff <u>Philadelphia</u> (EXCEPT IN U.S. PLAINTIFF CASES) | County of Residence of First Listed Defendant <u>Providence</u> (IN U.S. PLAINTIFF CASES ONLY) |
| (c) Attorneys (Firm Name, Address, and Telephone Number) Nadeem A. Bezar, Esq./ David C. Williams, Esq. Kline & Specter, P.C. 1525 Locust Street, Philadelphia, PA 19102 | Attorneys (If Known) <div style="text-align: center;">17 1659</div> |

| II. BASIS OF JURISDICTION (Place an "X" in One Box Only) | III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant) | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|---------------------------------------|---|----------------------------|---------------------------------------|-----|-----|-----------------------|----------------------------|----------------------------|---|----------------------------|----------------------------|--------------------------|----------------------------|---------------------------------------|---|----------------------------|---------------------------------------|---|----------------------------|----------------------------|----------------|----------------------------|----------------------------|
| <input type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input checked="" type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III) | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input checked="" type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td><input type="checkbox"/> 5</td> <td><input checked="" type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table> | | PTF | DEF | | PTF | DEF | Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 | Citizen of Another State | <input type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 | Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |
| | PTF | DEF | | PTF | DEF | | | | | | | | | | | | | | | | | | | | |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 | | | | | | | | | | | | | | | | | | | | |
| Citizen of Another State | <input type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 | | | | | | | | | | | | | | | | | | | | |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 | | | | | | | | | | | | | | | | | | | | |

| IV. NATURE OF SUIT (Place an "X" in One Box Only) | | | | | |
|---|---|---|--|---|--|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | FORFEITURE/PENALTY <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other | BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |
| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | PRISONER PETITIONS Habens Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act | SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) | FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 |

| | | | | | |
|---|---|--|---|--|---|
| V. ORIGIN (Place an "X" in One Box Only) | | | | | |
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from Another District (specify) | <input type="checkbox"/> 6 Multidistrict Litigation |

| | |
|----------------------------|---|
| VI. CAUSE OF ACTION | Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. § 1332, 28 U.S.C. § 1391 Brief description of cause: Negligence and Premises Liability claims arising during study abroad program |
|----------------------------|---|

| | | |
|-------------------------------------|---|---|
| VII. REQUESTED IN COMPLAINT: | <input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. | DEMAND \$ _____ CHECK YES only if demanded in complaint: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
|-------------------------------------|---|---|

| | |
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| VIII. RELATED CASE(S) IF ANY | (See instructions): JUDGE _____ DOCKET NUMBER <u>APR 11 2017</u> |
|-------------------------------------|--|

| | |
|--------------------|--|
| DATE 04/11/2017 | SIGNATURE OF ATTORNEY OF RECORD <u>D. C. Williams</u> |
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| | |
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| FOR OFFICE USE ONLY | RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____ |
|---------------------|--|

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: c/o Kline & Specter, 1525 Locust Street, Philadelphia, PA 19101
 Address of Defendant: 2 College Street, Providence, Rhode Island 06102
 Place of Accident, Incident or Transaction: Ireland
 (Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
 (Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒
 Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒
 RELATED CASE, IF ANY:
 Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
 Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
 Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
 Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
 Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

| | |
|--|--|
| <p>A. Federal Question Cases:</p> <ol style="list-style-type: none"> 1. <input type="checkbox"/> Indemnity Contract, Marine Contract, and All Other Contracts 2. <input type="checkbox"/> FELA 3. <input type="checkbox"/> Jones Act-Personal Injury 4. <input type="checkbox"/> Antitrust 5. <input type="checkbox"/> Patent 6. <input type="checkbox"/> Labor-Management Relations 7. <input type="checkbox"/> Civil Rights 8. <input type="checkbox"/> Habeas Corpus 9. <input type="checkbox"/> Securities Act(s) Cases 10. <input type="checkbox"/> Social Security Review Cases 11. <input type="checkbox"/> All other Federal Question Cases (Please specify) _____ | <p>B. Diversity Jurisdiction Cases:</p> <ol style="list-style-type: none"> 1. <input type="checkbox"/> Insurance Contract and Other Contracts 2. <input type="checkbox"/> Airplane Personal Injury 3. <input type="checkbox"/> Assault, Defamation 4. <input type="checkbox"/> Marine Personal Injury 5. <input type="checkbox"/> Motor Vehicle Personal Injury 6. <input checked="" type="checkbox"/> Other Personal Injury (Please specify) 7. <input type="checkbox"/> Products Liability 8. <input type="checkbox"/> Products Liability — Asbestos 9. <input type="checkbox"/> All other Diversity Cases (Please specify) <u>Negligence and Premises Liability claim arising during study abroad program</u> |
|--|--|

Nadeem A. Bezar and
David C. Williams counsel of record do hereby certify:
 Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
☐ Relief other than monetary damages
 DATE: 4/11/17
Dal Qili Attorney-at-Law
 NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.
 DATE: 4/11/17
 CIV. 609 (5/2012)

63577/
 308745
 APR 11 2017
 63577/
 308745
 APR 11 2017



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

"Jane Doe", a pseudonym :

CIVIL ACTION

v. :

17 1659

Rhode Island School of Design :

NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.)
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

4/11/2017

Date

David Williams
Attorney-at-law

Plaintiff "Jane Doe"

Attorney for

215-772-1000

Telephone

215-735-5827

FAX Number

David.Williams@klinespecter.com

E-Mail Address

(Civ. 660) 10/02

APR 11 2017